

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DISTRICT**

BRIAN GOFF, EXECUTOR OF THE  
ESTATE OF FERRELL GOFF, as  
Assignee of Mboutidem Etokakpan,

Plaintiff,

V.

TRACO INTERNATIONAL GROUP S.  
de R.L.

Defendant.

CASE NO. 4:25-cv-259

JUDGE BONITA PEARSON

**PLAINTIFF’S MOTION FOR**  
**DEFAULT JUDGMENT**

Plaintiff Brian Goff, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, hereby requests an Order entering default judgment against Defendant TRACO International Group S. de R.L. (“TRACO”) as follows:

1. A monetary judgment in the total amount of \$547,638.75, consisting of:
  - a. Judgment in the amount of \$535,000 on Count I of Plaintiff's Complaint for TRACO'S breach of settlement contract;
  - b. Judgment in the amount of \$12,638.75 on Count II of Plaintiff's Complaint, consisting of \$8,312.50 in attorneys' fees and \$4,326.25 in case expenses, those costs being incurred as a result of TRACO's bad faith handling of the underlying insurance claim;
2. Pre-judgment interest in the amount of \$53,705.21;
3. Post-judgment interest pursuant to 28 U.S.C. § 1961; and
4. Any other legal or equitable relief that this Court deems appropriate.

Plaintiff's Memorandum in Support of Default Judgment is attached hereto, with supporting exhibits, and incorporated herein by reference.

**CERTIFICATE OF SERVICE**

The foregoing was served this 18th day of July, 2025 via Regular U.S. Mail to  
the following:

TRACO International Group S. de R.L.  
1900 Pearl Street, Suite 2400  
Dallas, TX 75201

With a copy via email to:

Timothy Walsh  
twwalsh@steptoe.com

/s/ Scott D. Perlmutter  
SCOTT D. PERLMUTER (0082856)